

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Marc E. Hirschfield  
Terry Brennan

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

IRWIN LIPKIN, *et al.*,

Defendants.

Adv. Pro. No. 10-04218 (SMB)

**STIPULATION FOR EXTENSION OF TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants Eric Lipkin, Erika Lipkin, individually, and in her capacity as Custodian UGMA/NJ for [C.L.], [D.L.] and [S.L.]; [C.L.], by and through Erika Lipkin, parent and Custodian; [D.L.], by and through Erika Lipkin, parent and Custodian, and [S.L.], by and through Erika Lipkin, parent and Custodian may move, answer or otherwise respond to the Complaint is extended from September 10, 2015 up to and including October 13, 2015.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. This is the forty-seventh such extension for Defendants Eric Lipkin and Erika Lipkin, individually, and in her capacity as parent and Custodian of [C.L.], [D.L.] and [S.L.]. Nothing in this stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 10106) in the above-captioned case (No. 08-01789 (SMB)).

Dated: September 9, 2015

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marc E. Hirschfield  
Email: mhirschfield@bakerlaw.com  
Terry Brennan  
Email: tbrennan@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and for the Estate of Bernard L.  
Madoff*

JAMES K. FILAN

By: /s/ James K. Filan  
315 Post Road West  
Westport, Connecticut 06880  
Telephone: (203) 557-9159  
Facsimile: (203) 341-8560  
James K. Filan  
Email: jfilan@jamesfilan.com

*Attorney for Defendant Eric Lipkin*

FINN DIXON & HERLING LLP

By: /s/ Tony Miodonka  
Finn Dixon & Herling LLP  
177 Broad Street  
15th Floor  
Stamford, CT 06901  
(203) 325-5000  
Fax : (203) 325-5001  
Email: tmiodonka@fdh.com  
Email: apavlis@fdh.com

*Attorneys for Defendants Erika Lipkin, individually,  
and in her capacity as Custodian UGMA/NJ for  
[C.L.], [D.L.] and [S.L.]; [C.L.], by and through  
Erika Lipkin, parent and Custodian; [D.L.], by and  
through Erika Lipkin, parent and Custodian; and  
[S.L.], by and through Erika Lipkin, parent and  
Custodian*